

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

BEARBOX LLC and AUSTIN STORMS,)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. 21-534-MN-CJB
)	
LANCIUM LLC, MICHAEL T. McNAMARA,)	
and RAYMOND E. CLINE, JR.)	
)	
Defendants.)	
)	

STIPULATION AND [PROPOSED] ORDER

IT IS HEREBY STIPULATED by and between Plaintiffs Bearbox LLC and Austin Storms (“Plaintiffs”) and Defendants Lancium LLC, Michael T. McNamara, and Raymond E. Cline, Jr., (collectively, “Defendants”) that the case schedule should be supplemented and amended to extend the time to complete expert discovery on damages issues and dispositive/*Daubert* motions on damages issues. The parties seek these additions and changes because, on April 22, 2022, the Court ordered Lancium to produce additional financial documents in response to Plaintiffs’ motion to compel. D.I. 124. Based on this production, the parties agree that Plaintiffs damages expert may submit a supplemental report addressing these additional documents, followed by Lancium’s expert’s rebuttal damages report and Plaintiffs’ expert’s reply damages report. These changes will not affect the deadlines for expert reports and dispositive/*Daubert* motions on issues other than damages. These changes also will not affect the total page limits for dispositive/*Daubert* motions or the start of trial.

Accordingly, the parties hereby stipulate and agree, subject to the approval and Order of the Court, that the Scheduling Order is amended as set forth in the table below.

Event	Deadline
Plaintiffs' Supplemental Damages Expert Report	May 27, 2022
Defendants' Responsive Damages Expert Report	June 15, 2022
Plaintiffs' Reply Damages Expert Report	June 24, 2022
Damages Expert Deposition Deadline	June 30, 2022
Dispositive and <i>Daubert</i> motions on issues other than damages	June 13, 2022 (unchanged)
Dispositive and <i>Daubert</i> motions on damages issues	July 8, 2022
Pretrial conference	November 22, 2022 (unchanged)
Trial	December 5, 2022 (unchanged)

Dated: May 20, 2022

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Attorneys for Defendants

SO ORDERED this ____ day of _____, 2022.

United States Judge